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20 UNITED STATES DISTRICT COURT  
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF  
24 GOVERNMENT EMPLOYEES, AFL-CIO;  
25 AMERICAN FEDERATION OF STATE  
26 COUNTY AND MUNICIPAL EMPLOYEES,  
27 AFL-CIO, et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**SUPPLEMENTAL DECLARATION OF  
DON NEUBACHER**

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I, Don Neubacher, declare as follows:

1. I am a Board Member of the Coalition to Protect America's National Parks, which is a Plaintiff in this action. This declaration supplements my previous declaration in support of Plaintiffs' TRO application (Dkt. 18-15).

2. As noted in my previous declaration, the reductions in staffing as a result of OPM's termination of probationary employees are likely to have dire impacts on safety, environmental quality, and services to the public in the National Parks.

3. In my previous declaration, I predicted based on my experience in the National Park Service that staffing reductions would quickly lead to service reductions. In just the two weeks since the probationary employee terminations got underway, our members, who are avid users of the National Parks, have confirmed my prediction, as they are starting to observe the first signs of these direct impacts.

4. To give just one example, last weekend, one of our members reported to the Coalition's Board that he saw the impact of reduced staffing first-hand on a visit to Joshua Tree National Park in southern California. He reported that the Black Rock Nature Center, which provides water and toilets for the public, remained closed well after its scheduled opening time, even though outdoor temperatures were in the 30s with strong winds. There were numerous park visitors waiting to be let in, and no Park Service employees to be found. The member and his party decided to leave rather than standing outside in the cold. Such lapses in service are only likely to worsen.

5. As noted in my previous declaration, I had a 36-year career in the National Park Service (NPS), including serving as the Superintendent of Yosemite National Park and the Point Reyes National Seashore, as well as appointments at Glacier Bay National Park and the Denver Service Center. I continue to be a regular visitor to the National Parks, especially Yosemite and Point Reyes (which is near my home), for recreation and relaxation. I would personally find it extremely distressing if reductions in NPS staffing degrade the sensitive natural resources of the parks or impair their safety and beauty.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
2 and correct. Executed this 26th day of February 2025 in Point Reyes Station, California.

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Don Neubacher